

**Calocerinos & Spina
CONSULTING ENGINEERS**

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

March 11, 1985

Mr. Angelo Bellomo
Regional Administrator
Toxic Substances Central Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Closure Certification
Trent Tube Facility
Fullerton, California
CAD 008325110

File: 469.003

Dear Sir:

This letter is to certify that the Fullerton Plant of Trent Tube Division at 2100 E. Orangethorpe Avenue, Fullerton, California, has been closed in accordance with the provisions of the following documents:

1. Closure Plan submitted on April 1, 1984.
2. Regional Water Quality Control Board comments of May 4, 1984.
3. Site Assessment Plan submitted on December 18, 1984.
4. Site Remediation Plan submitted on January 18, 1985.
5. Excavation Permits by SCAQMD dated February 5, 1985.
6. Department of Health Services comment letter of February 20, 1985.

The enclosed Facilities Closure Report documents the closure activities at the Plant and includes photographs of the excavation work along with manifests documenting proper disposal of the hazardous components.

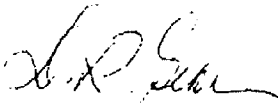


Mr. Angelo Bellamo
March 11, 1985
Page 2

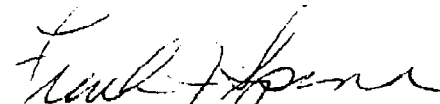
We therefore request that you furnish Trent Tube with written acknowledgment of proper closure of the Facility and delete the Interim Status Permit for this Facility from your records.

For: TRENT TUBE DIVISION
COLT INDUSTRIES

For: CALOCERINOS & SPINA
CONSULTING ENGINEERS

 3/12/85

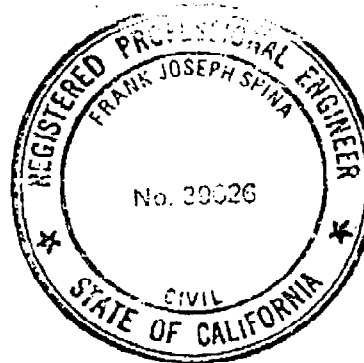
D. R. Gehr
Vice President
Technical Services

 3/12/85

Frank J. Spina, P.E.
Partner

FJS:RWK:mts

Enclosure



DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7128
LOS ANGELES, CA 90012
(213) 620-2380



March 4, 1985

Mr. Robert Phillips
Trent Tube Division
Colt Industries
P.O. Box 88
Pittsburg, PA 15230

Dear Mr. Phillips:

CLOSURE OF TRENT TUBE FACILITY, FULLERTON, CALIFORNIA (CADO08325110)

This is to confirm the agreements reached in the February 20, 1985 meeting at this office between you and your representatives and Harry Sneh and Roy Thielking of my staff.

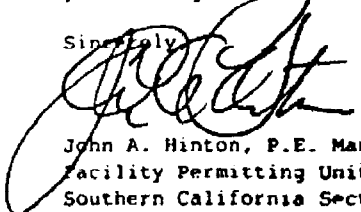
It is our understanding that Trent Tube has agreed to the following:

- Excavate and remove to a Class I landfill that volume of soil within a curve connecting borings D-1, C-3, C-2 and D-3 on figure 8 of the February 11, 1985 closure plan, to a uniform depth of five feet.
- Mitigation of other soil within area B and C as defined in the closure plan.
- The proposed actions shall commence on February 25, 1985, weather and other technical factors permitting, and shall be completed within two weeks if possible.
- Upon completion of the proposed mitigation actions, Trent Tube will submit to this office a completion report and certification of closure by an independent engineer registered in the State of California.

The fourth paragraph of our February 1, 1985 letter to Trent Tube Division is hereby deleted, based upon your representation that the area in question is not owned by Trent Tube.

If you have any questions, please call Roy Thielking at the above number.

Sincerely,


John A. Hinton, P.E. Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

cc: See next page

Mr. Robert Phillips

-2-

cc: Mr. James Anderson
California Regional Water
Quality Control Board
6809 Indiana Avenue, Suite 200
Riverside, CA 92506

Mr. Fred E. Lettice
Southern California Air Quality
Management Division
9150 Flair Drive
El Monte, CA 91731

Atty. Wayne W. Smith
Gibson, Dunn & Crutcher
333 South Grand Avenue
Los Angeles, CA 90071

JH:RT:mf

PIE-A-7



Calocerinos & Spina
CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

August 29, 1984

Mr. Angelo Bellomo
Regional Administrator
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Closure Certification
Trent Tube Facility
Fullerton, California
CAD 008325110

Dear Sir:

On August 16, 1984, Mr. Richard Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, inspected the vacant Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

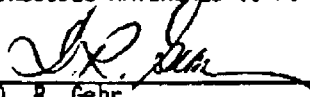
Based on his inspection of the physical facilities, as well as photographs, manifests and billing records, we hereby certify that the Facility has been closed in accordance with the "Closure Plan" submitted by Trent Tube Division to your office on April 1, 1984.

The closure activities also included removal of the top three (3) feet of oil-contaminated soil on the two (2) areas on the south side of the Plant which were referenced in Mr. James Anderson's memo to you of May 4, 1984.

We therefore request that you delete the Interim Status Permit for this Facility from your records.


For:

TRENT TUBE DIVISION
CRUCIBLE MATERIALS CORP.


D. R. Gehr
Vice President
Technical Services

For:

CALOCERINOS & SPINA
CONSULTING ENGINEERS


Frank J. Spina, P.E.
Partner

CC: Mr. James Anderson
Executive Officer
Regional Water Quality Board
Suite 200, 6809 Indiana Street
Riverside, California 92506

Mr. Harry Murphy, Trent Tube Div.



C&S OFFICES: SYRACUSE • ATLANTA • PITTSBURGH • BUFFALO

MWNA-WZI 111392

State of California

PIE-A

Memorandum

To : Angelo Bellomo, Regional Administrator
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, CA 90012

Date: May 4, 1984

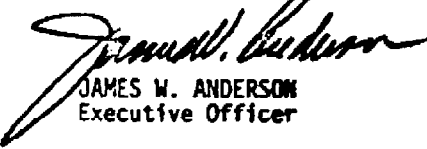
From : California Regional Water Quality Control Board—Santa Ana Region
6805 INDIANA AVENUE, SUITE 200, RIVERSIDE, CA 92506 (ATSS) 632-4130

Subject: TRENT TUBE DIVISION (CAD 008325110) CLOSURE PLAN

We have received a closure plan for the Trent Tube Division Facility in Fullerton (a copy was sent to your office). It is our understanding that for storage facilities your office has approval authority for closure plans. We therefore are referring this matter to you for review.

We have, however, reviewed the plan and inspected the facility with respect to its impact on water quality. During the inspection, small areas of soil contaminated with waste oil were noted on the south side of the plant. Mr. Harry Murphy, Plant Manager, stated that soil in these areas will be removed to a depth of three feet during closure. This is not included in the closure plan.

With the above exception, no problems were noted during the inspection or in our review of the closure plan as submitted. If you have any questions on this matter, please contact Kurt Berchtold of my staff.


JAMES W. ANDERSON
Executive Officer

cc: Robert M. Phillips, Trent Tube Division
Harry Murphy, Trent Tube Division
Fred Lercari, SWRCB - DTS

KVB:kyb

EXHIBIT A

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY
DEPARTMENT OF HEALTH SERVICES
730 MAIN STREET, ROOM 2120
SAN FRANCISCO, CA 94102

SENDER'S INFORMATION



Mr. Robert M. Phillips
Trent Tube Division
Crucible Materials Corp
P.O. Box 68
Pittsburgh, PA 15230

Dear Mr. Phillips:

CLOSURE PLAN DEFICIENCIES RE: CLOSURE OF TRENT TUBE FACILITY, FULLERTON, CA
(CAD 000325110)

The closure plan you submitted on August 24, 1981 regarding the subject facility is inadequate. Therefore, the subsequent closure certification is inappropriate.

You are directed to submit to this office by December 15, 1981 a revised written site assessment plan prepared by an independent engineer registered in the State of California.

The plan must provide for sampling and chemical assessment of all areas which were excavated at the direction of the California Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. Areas where chlorinated solvents were used, stored, or may have been spilled are of particular concern. The plan must identify all principals, including the analytical laboratory and all other contractors used. Drawings, sketches and/or photographs necessary to fully describe areas of concern and proposed remedial actions should also be included.

The assessment plan must be approved by this office prior to any further construction, excavation or other work in the affected areas.

If you have any questions or wish to further discuss this matter please call Roy Thielking of my staff.

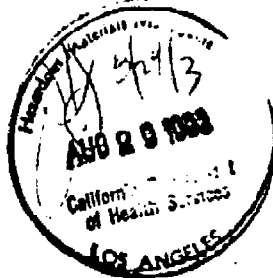
John Hinton, P.E., Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division

JH:KTP

cc: See attached list
CERTIFIED

MWNA-WZI 111394

Colt Industries



PLC-A-1
Trent Tube Division
Crucible Inc
P. O. Box 3088
2100 East Orangefhorpe
Fullerton, California 92634
714/528-5522

CAD 008325110

August 26, 1983

California State Dept. of Health Services
Hazardous Waste Management Branch
107 South Broadway, Room 7128
Los Angeles, California

Gentlemen:

Enclosed is our operation plan for hazardous waste,
treatment and storage at the Fullerton operation.

This letter will also serve as notice that this plant
will close on or before December 31, 1983. A closure plan
is incorporated as part of the operation.

Sincerely,

Harry L. Murphy
Manager of Quality Assurance

cc: C. Abend
D. Gehr
F. Hunter

TRENT TUBE DIVISION - ~~SOLT~~ INDUSTRIES
FULLERTON, CALIFORNIA

CLOSURE PLAN AND COST ESTIMATES
FOR HAZARDOUS WASTE FACILITIES

FACILITY: Trent Tube Division, Fullerton Operation
2100 East Orangethorpe Avenue
Orange County
Fullerton, California 92634

OPERATOR: Trent Tube Division
Crucible Materials Corporation
P.O. Box 3068
Fullerton, California 92634

FACILITY ID NO.: CAD 008325110

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

- A. This plan is prepared in compliance with the California Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.
- B. This plan is to be submitted for approval to the California Regional Water Quality Board (CRWQB) prior to closure.

The local board is located at:

6809 Indiana Street
Suite 200
Riverside, California

Attention: Mr. James Anderson
Executive Officer
714/684-9330

II. WASTE INVENTORY

A. Pickle Liquor - EPA Number K062

- (1) Contained in two process tanks of 2000 gallons each.
Maximum volume at closure, 4000 gallons total.
- (2) Waste is neutralized prior to disposal.

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

B. 1,1,1 Trichloroethane Waste - EPA Number P001

- (1) Waste is contained in 55 gallon drums. Maximum storage capacity is 15 drums.
- (2) Solvent used during manufacturing is contained in a degreaser unit having a maximum capacity of 2400 gallons.

C. Waste Mineral Spirits & Kerosene

- (1) Contained in 55 gallon drums.
- (2) Storage capacity at closure is 8 drums.

D. Waste Oil - EPA Number NA

- (1) Contained in 10/20 gallon reservoirs at each of six draw benches.
- (2) Maximum storage capacity is 200 gallons bulk waste plus the reservoir at each draw bench.

E. Dilute Detergent Cleaning Wastes - EPA Number NA

- (1) Contained in a steel storage tank 200 gallons maximum capacity.

III. FACILITY DECONTAMINATION STEPS

A. Pickle Liquor Facilities

- (1) Neutralize pickling acids with ammonia as per operating plan.
- (2) Pump neutralized solutions to bulk tank truck.
- (3) Manifest solutions for treatment and disposal.
- (4) Dismantle and cut up nitric-HF pickle tank and exhaust intakes inside building.
- (5) Manifest contaminated equipment for disposal.
- (6) Arrange with supplier to remove ammonia storage tanks and vent ammonia feed system.

B. 1,1,1 Trichloroethane Facilities

- (1) Arrange with reclaimer to pump out degreasing tank, recovery still equipment and 55 gallon drums of still bottoms.
- (2) Arrange with reclaimer to haul off remaining quantities of virgin solvent in outside storage tanks.

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

- (3) Rinse degreasing tank and recovery still system with detergent and water pump detergent solution to bulk tank truck for disposal.
- (4) Manifest solvent and cleaning solution for disposal.
- (5) Arrange with vendor for removal of vertical storage tank.
- (6) Clean and ventilate remaining horizontal storage tank.

C. Mineral Spirit and Kerosene Facilities

- (1) Arrange with reclaimer to pump out 55 gallon drums.
- (2) Clean impound areas with detergent solution.
- (3) Transfer cleaning solution to the 200 gallon storage tank.
- (4) Manifest mineral spirits and kerosene for disposal by recycling.

D. Waste Oil Facilities

- (1) Transfer oil from draw bench reservoirs to 200 gallon storage tank.
- (2) Rinse draw bench reservoirs and pump system with detergent solution.
- (3) Transfer detergent solution to storage tank.
- (4) Arrange for disposal of waste oil from 200 gallon storage tank.
- (5) Rinse out 200 gallon storage tank with detergent.
- (6) Rinse out oily waste impound area with detergent.

E. Detergent Cleaner Solution Disposal

- (1) Pump out 200 gallon storage tanks (2) and impound area into tank truck.
- (2) Manifest cleaning solutions for proper disposal.

F. Empty Drum Disposal

- (1) Arrange for drum reprocessor to pick up reusable drums.
- (2) Crush unusable drums and manifest for disposal.

IV. CLOSURE SCHEDULE

- A. After suspension of manufacturing operations, additional wastes due to clean-up operations, etc. will be generated for a maximum of thirty (30) days.
- B. Upon suspension of manufacturing operations, all wastes will be treated within forty (40) days and removed from the premises within sixty (60) days.

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

V. COST ESTIMATES FOR FACILITY CLOSURE

A. Pickle Liquor and Facilities

- | | |
|---|-------------|
| (1) Labor costs for neutralization of acids and cleaning and removal of tank and exhaust system. 60 hours @ \$18/hr. | \$1060 |
| (2) Transportation, treatment, and disposal of 4000 gallons of neutralized pickle liquor. (4000 gal.) X (8.34 #/gal.) X (125/ton) = (2000 #/gal.) | 2085 |
| (3) Transportation and disposal of pickle tank and exhaust system. | <u>1200</u> |

Subtotal \$4365

B. 1,1,1 Trichloroethane Facilities

- | | |
|--|------------|
| (1) Labor costs for cleaning tanks. 24 hours @ \$18/gal. | 432 |
| (2) Credit for recovered solvent. 2000 gal. @ \$.60/gal. | (1200) |
| (3) Disposal of detergent rinse solution. | <u>400</u> |

Subtotal - Credit (\$368)

C. Mineral Spirits and Kerosene Facilities

- | | |
|------------------------------------|---------|
| (1) Credit for solvent recoveries. | (\$125) |
|------------------------------------|---------|

Subtotal - Credit (\$125)

D. Waste Oil Facilities

- | | |
|---|-------|
| (1) Labor to transfer oil from draw benches to waste oil tank, clean oil reservoirs, storage tank and impound area. 24 hours @ \$18/hr. | \$432 |
|---|-------|

- | | |
|---|------------|
| (2) Transportation and disposal of waste oil. | <u>400</u> |
|---|------------|

Subtotal \$832

E. Detergent Cleaning Solution Disposal

- | | |
|----------------------------------|--------------|
| (1) Transportation and disposal. | <u>\$400</u> |
|----------------------------------|--------------|

Subtotal \$400

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

F. Empty Drum Disposal

(1) Cleaning of reusable drums by drum processor. \$10 each X 20 drums	\$200
(2) Crushing and disposal of non-reusable drums. \$15 X 15 drums	<u>225</u>
Subtotal	\$425

G. Administration Consultant Services & Contingencies

(1) Administration and supervision	\$3000
(2) Professional engineer recommendations, inspection and certification.	5000
(3) Contingencies	<u>2000</u>
Subtotal	\$10,000

H. Total Estimated Closure Cost - 4/2/84 \$15,529

April 4, 1984
Date

Harry L. Murphy
Harry L. Murphy
Plant Manager

Colt Industries



Handwritten: 11/15/83
PIE-A
Signature

Trans Tube Division
Crucible Inc
P. O. Box 3088
2100 East Orangefhorpe
Fullerton, California 92634
714/628-6622

CAD 008325110

November 7, 1983

California State Dept. of Health Services
Hazardous Waste Management Branch
107 South Broadway, Room 7128
Los Angeles, California 90012

Gentlemen:

On August 26, we sent you our hazardous waste operation plan. At that time I reported that this facility would close on or before December 31, 1983. Now, plant closing has been extended to on or before June 30, 1984.

Please advise me if further action is required on my part, other than this notice.

Sincerely,

Handwritten signature: Harry L. Murphy

Harry L. Murphy
Manager of Quality Assurance

HLM:km

cc: D. Gehr
R. Haak
F. Hunter